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26 KEYPOINT GOVERNMENT SOLUTIONS, INC.

27 UNITED STATES DISTRICT COURT

28 NORTHERN DISTRICT OF CALIFORNIA

19 DONALD LOUNIBOS, on behalf of
20 himself and all others similarly situated,

Case No. 12-CV-0636 (EMC)

21 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER CONTINUING ADR DEADLINE
AND CONTINUING CASE
MANAGEMENT CONFERENCE**

22 v.

23 KEYPOINT GOVERNMENT
24 SOLUTIONS, INC., a Delaware
25 Corporation and DOES 1-10, inclusive,

26 Defendants.

1 The parties hereby stipulate as follows:

WHEREAS, the instant matter was referred to panel mediation through the ADR Department of the Northern District of California. The parties were assigned to mediate this matter with the Honorable David A. Garcia (Ret.) through JAMS in San Francisco, California. To this end, the parties' current deadline to complete mediation is October 15, 2012. A Further Case Management Conference is currently scheduled to take place on October 26, 2012 at 10:30 a.m. in Courtroom 5, before the Honorable Edward M. Chen;

WHEREAS, the parties have exchanged documentation and taken the deposition of the Plaintiff Donald Lounibos, as well as taken the depositions of two employees at Defendant KeyPoint Government Solutions, Inc. During the depositions, the parties acknowledged the need for an additional exchange of documentation in order to ensure a productive mediation. As a result, the mediation with Judge David A. Garcia (Ret.) was rescheduled to take place at JAMS in San Francisco on November 2, 2012, the first mutually-agreeable date for all parties;

WHEREAS, the parties respectfully request that the Court grant a 30-day continuance of the parties' mediation deadline so that the parties can take part in mediation with Judge Garcia on November 2, 2012;

IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete all mediation efforts on or before November 15, 2012. The parties further stipulate to continue the Case Management Conference until November 30, 2012, at 10:30 a.m. in Courtroom 5, if that date is convenient to the Court. The parties shall file a Joint Case Management Statement at least one week prior to the Case Management Conference.

IT IS SO STIPULATED.

DATED: October 10, 2012

NORTH BAY LAW GROUP

/s/

1 DATED: October 10, 2012

2 LITTLER MENDELSON

3 /s/

4 Michelle Heverly
5 Attorneys for Defendant
6 KEYPOINT GOVERNMENT SOLUTIONS

7 **IT IS HEREBY ORDERED AS FOLLOWS:**

8 The parties shall engage in mediation with Hon. David A. Garcia at JAMS in San Francisco
9 on November 2, 2012, and all mediation efforts shall be completed on or before November 15, 2012.
10 The Case Management Conference is continued to November 30, 2012, at 10:30 a.m. in
11 Courtroom 5. The parties shall file a Joint Case Management Statement at least one week prior to
12 the Conference.



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14 DATED: October 15, 2012
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17 Honorable Edward M. Chen
18 United States District Court Judge
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